

What Federal Agencies Are Doing in Poultry Dressing Sanitation^a

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Activities of 4 federal agencies concerned with poultry dressing sanitation are described. Correlation of the work of one agency with that of another is shown. Insofar as is required a unified program of sanitary control is conducted by the Food and Drug Administration, the Public Health Service, the U. S. Department of Agriculture and the Department of Defense. The interest of the public is protected by official regulations, inspection and grading services (which are self-supporting) and by assistance to state and local agencies in setting up sanitary control programs at these levels. There is law enforcement with regard to the wholesomeness, freedom from disease, improper processing, and misbranding of poultry in interstate commerce and in plants providing poultry that is shipped through interstate channels. Each of the 4 agencies operates under the authority of a specific public law, referenced in this study, and it is shown that overlapping of activities and duplication of effort are prevented.

Interest of Federal agencies in the problem of food plant sanitation has developed rapidly in recent years. Growth of the food processing industry, and the shift from home or small establishment methods of handling food to the large-production-line type of food processing has brought about a need for organized and sound sanitation programs in the production of foodstuffs. Although the principal emphasis on sanitation has been often in the field of public health, there is wide interest among many other groups in the protection of quality, elimination of spoilage and the aesthetic value of producing food under clean, wholesome and sanitary conditions.

The various Federal agencies have become concerned in poultry dressing sanitation through the functions that they perform. In some cases interest has developed through rendering certain services, in others through protecting the interest of the public, and in still others through the function of protecting the interest of Federal agencies making purchases under specification. Each agency operates according to delegations of authority under a specific public law. Thus, the field of activity of each agency is outlined, the particular interest defined and the method of carrying out the assignment is specified. This prevents overlapping of activities, duplication of effort, and keeps the cost of carrying out the programs at a minimum.

Although the fields of activities are clearly separated there is evidence of close cooperation—of working together to prevent misunderstandings. There is frequent

consultation between agencies to clarify objectives, to interpret regulations, to define terms, and to establish the reasonableness of contemplated action either alone or in cooperation with other agencies. In certain cases the services and regulations of one group are accepted by another Federal agency in carrying out its program.

Inspection of poultry meat is not covered by the regulations governing meat inspection by the U. S. Department of Agriculture. There is no compulsion that poultry dressing plants must be under the supervision of any Federal agency. The Federal agencies come into the picture only when there is a voluntary request for poultry inspection or grading services, when the product is produced under Federal Purchase Specifications for sale to a governmental agency, or when action is taken to protect the public interest against filthy, decomposed or adulterated food products.

The purpose of this paper is to set forth what the various agencies are doing in the field of poultry dressing sanitation and to indicate how the various programs are carried out.

FOOD AND DRUG ADMINISTRATION

This agency operates under authority of the Federal Food, Drug and Cosmetic Act (1). The program is nationwide and concerned with poultry products in interstate commerce, or products being processed for that purpose. It does not cover products processed and sold within a state. The principal aim is to protect the public interest by preventing the movement in interstate commerce of birds that are diseased, improperly processed, filthy, decomposed, or in any way injurious to health (2). One portion of the authority concerns factory inspection (3) with regard to sanitation and conditions of processing. This insures that products intended for interstate shipment are produced under sanitary and wholesome conditions.

Market surveys are regularly made to determine the quality and condition of the poultry products being sold. If a quality determination reveals up-grading, action is taken under the section of the law covering Misbranding (4). If filthy, diseased or decomposed products are found, or if it is revealed that birds have died other than by slaughter, action is taken by seizure of the product—and prosecution follows. Tracing the interstate shipment and making a sanitary survey of the plant where the processing took place may ensue.

In addition a regular program of sanitary inspection of poultry plants is carried out. Inspectors calling at a plant are concerned with the operation, equipment, sanitation and the condition of the final product. As a guide to the inspection a set of instructions in the form of a "14-point" program is used. This sets forth the points that should be covered in the inspection, the reason for determining the existing conditions and the interpretations of the observations.

The inspector makes the plant survey in the interest of protecting the public, but he is also of assistance to the processor in keeping his plant in order. The plant operator, or anyone designated by him, is at liberty to accompany the inspector through the plant, and they are advised wherein any operation

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is in conflict with the law. If the inspector makes the survey alone he advises the management of any objectionable conditions before leaving the plant. If during the plant inspection conditions are found that may result in the contamination of the product, prosecution and/or injunction proceedings may be instituted.

Inspectors carrying out this work are given extensive training in sanitation and are made familiar with the methods and techniques used in the dressing and handling of poultry. They are trained not only in making observations but also in collecting samples, in making photographs, and in obtaining material for bacterial and chemical analysis that will support legal action taken against poultry products believed unfit for sale under the law.

The Food and Drug Administration operates on a regional basis, but all proposals for legal action against poultry or against poultry packers are referred to the Washington, D. C. office for clearance. In this way the same yardstick of action is applied to all sections.

There is close coordination with other Federal agencies with regard to compliance with the Food, Drug and Cosmetic Act in carrying out inspection, grading, purchase, or research programs, in the uniform interpretation of terms and definitions, and in the dissemination of information to the public.

PUBLIC HEALTH SERVICE

The work of this agency is largely of a cooperative and advisory nature (5) and is not concerned with a direct food-inspection program. The service is charged with enforcement of the Interstate Quarantine Regulations (6). The section concerning the serving of food aboard interstate carriers (7) provides for inspecting the source of the food supply (8). If unfit poultry products were served aboard an interstate carrier, an inspection of the processing plant of origin could be ordered to determine if it had been processed under proper and sanitary conditions.

The Public Health Service provides advisory, informational, and consultative services to other Federal agencies, the States, their political subdivisions, and food industries, with regard to public-health and sanitation programs. Frequent requests have come from local and State regulatory agencies for information on recommended sanitary control procedures in the processing of poultry and poultry products. Similar requests also have been received from members of the poultry-processing industries.

Feeling that there is a need for a standard ordinance governing poultry-processing operations, and an accompanying code of interpretation, the Service has initiated field studies on the sanitation problems of the poultry industry. The project, which is supervised by a veterinary officer, has as its major objective the protection of the consuming public from food-borne diseases associated with poultry and poultry dishes. The cooperation of industry and State and local regulatory agencies is being sought in the interest of obtaining background information which will prove helpful in providing assistance in the promulgation of sound control programs.

As planned, the Service will develop sanitation standards, covering inspection for wholesomeness, which can be incorporated into a standard ordinance. This document will later be tested, on a demonstration basis, in several selected States and communities, to determine its workability and applicability. It must be emphasized that this publication, like all other standard ordinances of the Public Health Service, is designed for voluntary adoption by States, cities, and other jurisdictions concerned. A traditional major objective of the Public Health Service is to obtain wide agreement on the provisions of all ordinances and codes that it offers for adoption, even though they are never used as the basis of an over-all Federal enforcement program.

The Public Health Service prepares visual aids and develops plans for sanitation training programs pertaining to subjects covered by their recommended standards. Recently, personnel of this Service participated as staff members in the poultry-sanitation schools held under the supervision of the Department of Agriculture. Also, they cooperated in the final development of the "Sanitary Requirements" (10) under which the Department of Agriculture operates its inspection and grading service.

U. S. DEPARTMENT OF AGRICULTURE

The poultry sanitation work of the U. S. Department of Agriculture is centered primarily in the Poultry Branch of the Production and Marketing Administration, and may be divided into (a) poultry inspection, (b) poultry grading, and (c) poultry processing research. The first two are services provided by the Poultry Inspection and Grading Division, and the last is carried out in the Research Division.

U.S.D.A. poultry inspection and grading services have been available for almost 35 years. These services are not compulsory and are extended to individuals, processing plants, or other financially interested parties. They are performed only when the applicant complies with the provisions of the grading and inspection regulations, and are withdrawn whenever there is evidence of failure to comply.

The present authority for rendering the Poultry Grading and Inspection services is contained in the Agricultural Marketing Act of 1946 (9), and the regulations set forth as Part 70 of the Code of Federal Regulations (11). Upon receiving an application for services an official survey of the plant is made with regard to the adequacy of equipment and facilities to handle the work, the design and arrangement for carrying out a sanitation program, and guarding against contamination of products, etc. If all parts of the plant are adequate the service is granted and it becomes an "Official Plant." All products brought into or processed in an official plant must be handled in accordance with the sanitary requirements (10).

The inspection and grading services are on a self-supporting basis, and are not services rendered by a governmental agency from appropriated funds. The applicant agrees to pay the costs incurred and to comply with the various regulations.

The purpose of "poultry inspection" is to determine, during the eviscerating operation, the condition, healthfulness and fitness of poultry for human food, and the wholesomeness of edible parts or processed product produced from inspected poultry. In addition to the inspection of carcasses for freedom from disease and the determination of wholesomeness, the sanitation program and plant operation is under the supervision of the Veterinarian in charge.

"Poultry grading" involves the sorting of individual carcasses as to quality and size, and the determination of class and condition. The entire plant operation must be in accordance with the requirements for sanitation, facilities and operating procedures.

The requirements as to sanitation, facilities and operating procedures have applied to plants under poultry inspection service for many years, but became applicable to poultry dressing operations on July 1, 1951. Prior to that time the requirements had applied primarily to the eviscerating, packing, and certain other auxiliary rooms, but did not cover other parts of the plant. Under the new regulations all parts of an official plant used in connection with the operation must be equipped and operated in compliance with the sanitary standards. This applies not only in those plants under the supervision of a Veterinary inspector, but also those official plants in which only grading is done, or where poultry is dressed for subsequent handling in another official plant.

This means that all poultry products eligible to bear official identification marks must be produced under sanitary supervision throughout the process. The plant in which the poultry is killed and dressed must be under sanitary supervision even though the poultry is to be eviscerated or graded in another plant many miles away. Such a system insures that the products will be handled in a clean and sanitary manner throughout the entire processing and handling procedures.

The type of services where sanitary requirements are enforced include:

- a. Inspection of dressed poultry during evisceration and preparation as ready-to-cook.
- b. Inspection of poultry for canning and supervision of canning operations.
- c. Certification of dressed poultry produced under U.S.D.A. sanitary standards.
- d. Grading of dressed poultry.
- e. Grading of ready-to-cook poultry.

The sanitary provisions are considered as minimum standards; they are designed to insure that buildings are kept clean, free of rodents and insects, that drainage and plumbing systems are adequate, that equipment is designed, constructed and arranged to permit thorough cleaning, that the operating procedures conserve quality, prevent contamination and deterioration, and that the requirements are practicable in operation.

Requests for services have increased in recent years, and at the time of this report October 1952, it is estimated that during 1952 approximately 781,846,900 pounds of poultry products will be inspected for condition and wholesomeness, and that approximately 1,460,000,000 pounds of poultry will be processed under the U.S.D.A. sanitary requirements.

Personnel used in these programs are well trained for the job. Inspection of poultry carcasses is carried out by graduate Veterinarians. When any lay personnel are used, they are under the supervision of a Veterinarian. The operation of dressing plants is under trained sanitarians. Within the past year 10 sanitation schools have been held in various parts of the U. S. The average attendance at each of these schools was between 50 and 60 people. The purpose was to give thorough ground work in the services to be rendered, and to acquaint the staff with the fundamental problems of sanitation. Members of the teaching staff were drawn from colleges and experiment stations, and from various services of the Federal Government. These schools will be held each year to keep the staff informed of current developments and to train new personnel.

Research on poultry plant sanitation is carried out by the Poultry Branch in cooperation with industry. A Mobile Laboratory Unit is used and processing plants become the laboratories in which operational research is conducted. Recent research on the use of in-plant-chlorination (12) in poultry dressing has pointed to the lowering of bacterial populations on the surface of the birds. Also, the use of mechanical washing equipment, and the advantageous placement of such equipment in the plant, have been shown to improve the sanitary quality of dressed poultry.

The research involves studies on the scalding, picking, singeing and chilling of dressed birds, the washing, eviscerating, cutting up and packaging of ready-to-cook poultry, with the major objectives of improving the sanitary techniques with which each operation is carried out.

DEPARTMENT OF DEFENSE

The poultry sanitation program in this Department is centered on the procurement of poultry meat for the Armed Forces. During 1951 approximately 118,000,000 pounds of chickens and turkeys were procured for the Armed Forces; all of it was produced under rigid sanitary standards according to military specifications and under the sanitary supervision of the Army or Air Force Veterinary Corps.

The Veterinary Service, Office of the Surgeon General, is charged with the responsibility for making inspections pertaining to foods of animal origin (13), with the object of protecting the health of troops against disease transmitted through spoiled, damaged, or contaminated foodstuffs, and protecting the financial interests of the Government. The Veterinary Service (14) must pass on the sanitary condition of the plants, the conditions of manufacture and the quality of the delivered products, as well as on the product at destination and during storage. Such a program insures the delivery to the Armed Forces of clean, wholesome poultry meat of good sanitary history and of the quality specified in contracts.

A vendor proposing to bid on an Armed Forces contract must apply to the procuring agency for a Veterinary inspection of his establishment (15). If the plant and its equipment and the methods used conform to the approved principles of sanitation of The Surgeon General, Department of the Army, and to the technical requirements contained in the purchase specifications, the plant is placed on an approved list. Awarding of contracts is limited to approved plants or those operating under the U.S.D.A. Poultry Inspection Service.

If only dressed poultry is produced, the operation must be carried out under the supervision of the Veterinary Corps. How-

ever, if various types of ready-to-cook or canned poultry products are being produced the plant must be operated under the supervision of the Poultry Inspection Service of the U. S. Department of Agriculture (16), and automatically the sanitary requirements of that Service applied. However, the actual inspection of the product is a responsibility of the Veterinary Corps. In this case there is complete cooperation between the concerned Governmental Agencies, in that the services of one group are accepted, or required, in carrying out the duties of the other group. Also, there is integration with the activities of the Food and Drug Administration since all deliveries to the Armed Forces must conform in every respect with the provisions of the Federal Food, Drug and Cosmetic Act (1).

Officers and enlisted men carrying out the inspection duties mentioned above undergo intensive training in the Army Medical Service Meat and Dairy Hygiene School in Chicago. A portion of the training concerns the supervision of sanitation programs. Upon completion of the school the personnel is usually given on-the-line training in poultry processing plants before being given full responsibility for supervising the activities in a plant.

The Office of The Quartermaster General is charged with the development and promulgation of specifications or standards for the procurement of food items. Into the specifications are woven the basic requirements to be used in processing the item. An example of this is the military specification for dressed and ready-to-cook chickens (17), which provides for the inspection of the product during processing, packing, packaging, and for condition and quantity at destination by the Veterinary Corps.

SUMMARY

Each of the 4 agencies concerned with poultry dressing sanitation works in a field defined and authorized by specific laws. The activities of each is correlated with that of the other agencies insofar as it is desirable and necessary to obtain a unified program in the interest of the public. Services for inspection and grading of poultry are available upon request, and these services are self-supporting and voluntary programs. The requests for such services have markedly increased in recent years. Governmental poultry procurement programs carry the requirement of inspection and sanitary supervision by authorized Veterinarians.

There is law enforcement with regard to the wholesomeness, freedom from disease, improper processing, and misbranding of poultry in interstate commerce and the sanitation in plants providing such poultry. Poultry processed and sold within a state is not subject to such a program. States and local agencies may receive assistance in setting up sanitary control programs.

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3. *Ibid.*, Section 704, Factory Inspection.
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